

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ALBERT RAGUSEO, ROBERT GRUN,
JOSHUA GRUN, ZACHARY GRUN, JILL
GRUN, CHRISTINA AIELLO, ALYSSA
SBLENDORIO, MIRIAM BELANGER,
KAITLIN STROUD, THOMAS SANITATE
AND KATELYN GRABINSKY, on behalf of
themselves and all others similarly situated

Plaintiffs,

vs.

CENTRASTATE HEALTHCARE SYSTEMS,
INC.

Defendant

Civil Action No. 23-1024 (ZNQ)(LHG)

STIPULATION and ORDER

M.Z., on behalf of herself and all others similarly
situated,

Plaintiff

vs.

CENTRASTATE HEALTHCARE SYSTEM,
INC. and SHAUNNA ELLISON,

Defendants

Civil Action No. 23-1049(ZNQ)(LHG)

RICARDO CUBIDES and LAURA KANTHAL-
CUBIDES, Individually And On Behalf Of All
Others Similarly Situated,

Plaintiffs,

vs.

CENTRASTATE HEALTHCARE SYSTEM,
INC. and ATLANTIC HEALTH SYSTEM, INC.,

Defendants.

Civil Action No. 23-1075(ZNQ)(LHG)

MARIA CARO, individually and on behalf of all
others similarly situated,

Civil Action No. 23-1123 (ZLQ) (LHG)

<p>Plaintiff,</p> <p>vs.</p> <p>CENTRASTATE HEALTHCARE SYSTEMS, INC.,</p> <p>Defendant.</p>	
<p>FREDERICK DAWES, on behalf of himself and all others similarly situated,</p> <p>Plaintiff,</p> <p>v.</p> <p>CENTRASTATE HEALTHCARE SYSTEM, INC. and ATLANTIC HEALTH SYSTEM, INC.,</p> <p>Defendants.</p>	Civil Action No. 23-1130 (ZLQ) (LHG)
<p>RENA PUDDER, on behalf of herself and all others similarly situated,</p> <p>Plaintiff,</p> <p>vs.</p> <p>CENTRASTATE HEALTHCARE SYSTEM, INC. and ATLANTIC HEALTH SYSTEM, INC.,</p> <p>Defendants.</p>	Civil Action No. 23-1149 (ZLQ) (LHG)
<p>LEWIS CHEWNING, DAVID HEALEY, and BELLE ROSENBLOOM, Individually, and on Behalf of All Others Similarly Situated,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>CENTRASTATE HEALTHCARE SYSTEM, INC.,</p> <p>Defendant.</p>	Civil Action No. 23-1227 (ZLQ) (LHG)

Plaintiffs Albert Raguseo, Robert Grun, Joshua Grun, Zachary Grun, Jill Grun, Christina Aiello, Alyssa Sblendorio, Miriam Belanger, Kaitlin Stroud, Thomas Sanitate, Katelyn Grabinsky, M.Z, Ricardo Cubides, Laura Kanthal-Cubides, Maria Caro, Frederick Dawes, Rena Pudder, Lewis Chewning, David Healey, and Belle Rosenbloom (together “Plaintiffs”) and Defendants CentraState Healthcare System, Inc., Atlantic Health System, Inc., and Shaunna Ellison (together “Defendants”) hereby stipulate and agree (the “Stipulation”) as follows:

1. All of the captioned matters are hereby consolidated for all purposes under Civil Action No. 23-1024 (ZNQ)(LHG) with the caption:

IN RE: CENTRASTATE HEALTH SYSTEMS DATA BREACH LITIGATION

Civil Action No. 23-1024 (ZNQ)(LHG)

2. On a going forward basis, all papers shall be filed in Civil Action No. 23-1024 (ZNQ)(LHG). If a paper relates to less than all of the above actions, the caption shall indicate to which action(s) the paper relates.

3. Any actions transferred to this Court, directly filed in the District of New Jersey or removed to the District of New Jersey will automatically be consolidated with this action without the necessity of future motions or orders.

4. Plaintiffs shall file a Consolidated Amended Complaint on the later of April 17, 2023, or seven days after lead counsel has been appointed by the Court.

5. Defendants shall not answer, move, or otherwise respond to the separate individual complaints pending the filing of a Consolidated Amended Complaint.

6. Defendants shall answer, move, or otherwise respond to the Consolidated Amended Complaint within 30 days after filing.

7. Should Defendants choose to file a motion in response to the Consolidated Amended Complaint, they shall follow Judge Quraishi's judicial preferences requiring the filing of a letter of no more than three (3) single-spaced pages seeking a pre-motion conference before the expiration of their deadline to answer, move, or otherwise respond. Plaintiffs shall then submit a written response, not to exceed three (3) single-spaced pages within seven (7) days of the filing of Defendants' letter. The parties will then discuss an appropriate briefing schedule.

8. Nothing in this Stipulation and Order shall be construed as a waiver of any right or defense available to Defendants, including defenses related to service of process and jurisdiction.

9. The Clerk's office is instructed to close the member cases.

STIPULATED and AGREED to this day of March, 2023

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IT IS SO ORDERED, this 17th day of March, 2023



ZAHIR N. QURAISHI, U.S.D.J.
LOIS H. GOODMAN, U.S.M.J.